

CITY OF PALM DESERT

73-510 FRED WARING DRIVE
PALM DESERT, CALIFORNIA 92260-2578
TEL: 760 346-0611
FAX: 760 341-7098
info@palm-desert.org

May 15, 2006

Jonathan Nadler
Southern California Association of Governments
Transportation Conformity Working Group
818 West Seventh Street, 12th Floor (Main Building)
Los Angeles, CA 90017

**Re: Monterey Avenue Interchange at Interstate 10 Improvement Project
EA 08-0F0500-Particulate Matter PM_{2.5} Conformity**

Dear Mr. Nadler:

The City of Palm Desert (City), in partnership with the California Department of Transportation (Caltrans) District 8 and the County of Riverside (County), proposes the reconstruction of the westbound ramps at the Interstate 10 (I-10)/Monterey Avenue Interchange (IC). The improvements are necessary to alleviate the increasing traffic spawning from the growing communities of Palm Desert, Thousand Palms and Rancho Mirage. The project proposes realignment of the existing westbound off-ramp and construction of an additional westbound on-ramp from Varner Road. Varner road runs parallel to and north of the Interstate 10 from Date Palm Drive to Jefferson Street. The addition of the new westbound ramps to Varner Road will improve the existing signalized intersection spacing between the existing westbound and eastbound ramp termini on Monterey Avenue. The City of Palm Desert plans to fund 100% of the project costs with local Measure A funds from the study phase through to design and construction of the preferred alternative.

On March 10, 2006, the U.S. Environmental Protection Agency (EPA) published a final rule that establishes the transportation conformity criteria and procedures for determining which transportation projects must be analyzed for local air quality impacts in PM_{2.5} and PM₁₀ nonattainment and maintenance areas (71 Federal Register [FR] 12458). Transportation conformity is required under Clean Air Act section 176(c) 42 United States Code (U.S.C.) 7506(c) to ensure that federally supported highway and transit project activities are consistent with ("conform to") the purpose of the state quality implementation plan (SIP). EPA's transportation conformity rule (40 Code of Federal Regulations [CFR] 51.390 and Part 93) establishes the criteria and procedures for determining whether transportation activities conform to the SIP. Clean Air Act section 176(c)(1)(B) is the statutory criterion that must be met by all projects in nonattainment and maintenance areas that are subject to

transportation conformity. Section 176(c)(1)(B) states that federally-supported transportation projects must not "cause or contribute to any new violation of any standard in any area; increase the frequency or severity of any existing violation of any standard in any area; or delay timely attainment of any standard or any required interim emission reductions or other milestones in any area."

To meet statutory requirements, the March 10, 2006 final rule requires PM_{2.5} and PM₁₀ hot-spot analyses to be performed for projects of air quality concern. Qualitative hot-spot analyses would be done for these projects before appropriate methods and modeling guidance are available and quantitative PM_{2.5} and PM₁₀ hot-spot analyses are required under 40 CFR 93.123(b)(4). In addition, through the final rule, EPA determined that projects not identified in 40 CFR 93.123(b)(1) as projects of air quality concern have also met statutory requirements without any further hot-spot analyses (40 CFR 93.116(a)). The final rule defines the projects of air quality concern that require a PM_{2.5} and PM₁₀ hot-spot analysis in 40 CFR 93.123(b)(1) as:¹

- (i) New or expanded highway projects that have a significant number of or significant increase in diesel vehicles;
- (ii) Projects affecting intersections that are at Level-of-Service D, E, or F with a significant number of diesel vehicles, or those that will change to Level-of-Service D, E, or F because of increased traffic volumes from a significant number of diesel vehicles related to the project;
- (iii) New bus and rail terminals and transfer points that have a significant number of diesel vehicles congregating at a single location;
- (iv) Expanded bus and rail terminals and transfer points that significantly increase the number of diesel vehicles congregating at a single location; and
- (v) Projects in or affecting locations, areas, or categories of sites which are identified in the PM_{2.5} or PM₁₀ applicable implementation plan or implementation plan submission, as appropriate, as sites of violation or possible violation.

Conformity determinations require the analysis of direct and indirect emissions associated with the proposed project and compare them to the without project condition. If the total of direct and indirect emissions from the project reaches or exceeds

¹ U.S. Environmental Protection Agency and Federal Highway Administration, *Transportation Conformity Guidance for Qualitative Hot-Spot Analyses in PM₁₀ and PM_{2.5} Nonattainment and Maintenance Areas*, (PM₁₀ Protocol), March 2006, Appendix A.

regionally significant thresholds, the Lead Agency must perform a conformity determination to demonstrate the positive conformity of the federal action.

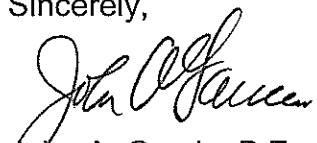
The project is currently programmed within the Southern California Association of Governments (SCAG) adopted 2004 Regional Transportation Improvement Plan (RTIP) and is described as follows: ID#RIV031208: at I-10/Monterey Ave IC – reconfigure and construct new westbound entry ramp from Varner Rd and realign/relocate westbound exit ramp.

The proposed improvements will improve local circulation and access to commercial and retail areas in the City. With out implementation of the proposed improvements, the existing westbound ramp intersection is forecast to operate at a deficient level of service (LOS), according to the acceptable County of Riverside performance criteria of LOS D or better. The realignment of the existing westbound off-ramp and the addition of a westbound on-ramp will decrease the accident rates on Monterey Avenue due to the increase in signalized intersection spacing between the westbound and eastbound ramp termini. Environmental and roadway conditions do not appear to be a contributing factor in the accidents cited for this segment of the Interstate 10 of the associated ramps at Monterey Avenue. The improvements are planned to accommodate future traffic projections to the year 2030.

Based upon the information provided above, the project is not expected to introduce significant amounts of diesel truck traffic and is not considered a project of significant concern per the definition contained within 40 CFR 93.123(b)(1). Thus, a less than significant impact with respect to PM_{2.5} and PM₁₀ would occur

We understand that the Draft Environmental Assessment (EA) and supporting technical studies have been approved for release to FHWA pending receipt of a preliminary proposal relative to the treatment of the new PM_{2.5} requirement. The City respectfully requests District consideration and acceptance of this letter as formal validation of the project's insignificant contribution of PM_{2.5}. The EA and supporting Air Quality Study will be revised prior to public circulation of the Draft EA and will include a statements noted above regarding PM_{2.5}.

Sincerely,


John A. Garcia, P.E.
Engineering Manager